

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Case No. 1:18-CV-68
	§	
UNITED STATES OF AMERICA, <i>et al.</i> ,	§	
	§	
Defendants,	§	
	§	
and	§	
	§	
KARLA PEREZ, <i>et al.</i> ,	§	
	§	
Defendant-	§	
Intervenors.	§	

**PEREZ DEFENDANT-INTERVENORS’
REPLY IN SUPPORT OF DISCOVERY MOTION**

Defendant-Intervenors Karla Perez, *et al.* (“Defendant-Intervenors”), hereby file this Reply in support of their Motion to Compel Discovery from Plaintiffs (Dkt. 429).

Plaintiffs stated in their Response, filed today, that “there is no additional information for Alabama and Arkansas to produce” in response to Defendant-Intervenors’ subpoenas *duces tecum*. See Dkt. 433 at 3-4. If in fact Plaintiffs have no additional information that responds to Defendant-Intervenors’ requests, and Defendant-Intervenors have not received the information they requested, then it may not be possible for Defendant-Intervenors to obtain the information they seek.

As explained in their motion, Defendant-Intervenors filed the motion to protect their ability to receive documents that they had requested in connection with the deposition of two

new witnesses identified by Plaintiffs. *Id.* at 2.¹

In response to the subpoenas *duces tecum*, Plaintiffs produced some documents before and during the depositions of their witnesses, but did not produce all the documents requested by Defendant-Intervenors. Plaintiffs committed to produce further responsive documents if they could identify them. *See* Exhibits A and B. Because the Court's Scheduling Order provided that discovery closed on September 23, 2019, Defendant-Intervenors conferred with Plaintiffs and filed their motion to compel on that day in order to preserve their ability to receive the outstanding discovery. Plaintiffs produced additional responsive documents on October 1, 2019 but again did not produce documents requested by Defendant-Intervenors. *See* Exhibit C.

Defendant-Intervenors requested documents that relate to claims by Plaintiffs Alabama and Arkansas that they expend state Medicaid funds on DACA recipients. Defendant-Intervenors requested that Plaintiffs' witnesses bring documents to their depositions supporting these claims – specifically documents showing that Alabama and Arkansas maintain DACA-related information in their Medicaid databases and that the claimed costs actually are attributable to DACA recipients.

Following review of Plaintiffs' production on October 1, 2019, Defendant-Intervenors informed Plaintiffs that the produced documents were not responsive to the subpoenas *duces tecum* because they did not specifically address DACA. *Id.*

Based on Plaintiffs' representation that "there is no additional information for Alabama and Arkansas to produce" in response to Defendant-Intervenors' requests, Defendant-

¹ On August 7, 2019, Plaintiffs identified 28 new witnesses and produced declarations which totaled 69 pages of new sworn testimony. Defendant-Intervenors ultimately took the depositions of two of those witnesses – Gretel Felton in Montgomery, Alabama on September 12, 2019 and Mary Franklin in Little Rock, Arkansas on September 18, 2019.

Intervenors may be foreclosed from obtaining the information they seek and will request the Court's guidance at the hearing on pending motions scheduled for tomorrow.

Dated: October 7, 2019

Respectfully submitted,

**MEXICAN AMERICAN LEGAL
DEFENSE AND EDUCATIONAL FUND**

By: /s/ Nina Perales

Nina Perales (Tex. Bar No. 24005046);
(SD of Tex. Bar No. 21127)

Attorney-in-Charge

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(Admitted pro hac vice)

**GARCÍA & GARCÍA,
ATTORNEYS AT LAW P.L.L.C.**

Carlos Moctezuma García
(Tex. Bar No. 24065265)
(SD of Tex. Bar No. 1081768)

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Phone: (956) 630-3889

Facsimile: (956) 630-3899

Email: cgarcia@garciagarcialaw.com

Attorneys for Proposed Defendant-
Intervenors

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on the 7th day of October, 2019, I electronically filed the above and foregoing document using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Nina Perales
Nina Perales

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

CASE NUMBER: 1:18-CV-68

STATE OF TEXAS, et al.,

Plaintiffs,

vs.

UNITED STATES OF AMERICA, et al.,

Defendants,

and

KARLA PEREZ, et al.,

Defendant-Intervenors,

and

STATE OF NEW JERSEY,

Defendant-Intervenor.

IT IS STIPULATED AND AGREED by and
between the parties that the deposition of
Gretel Felton may be taken before Angela Smith
McGalliard, RPR, CRR, CCR, at the offices of
the Alabama Attorney General, at 501 Washington
Ave., Montgomery, Alabama 36104, on the 12th
day of September, 2019.

DEPOSITION OF GRETTEL FELTON

1 IT IS FURTHER STIPULATED AND AGREED
2 that the signature to and the reading of the
3 deposition by the witness is not waived, the
4 deposition to have the same force and effect as
5 if full compliance had been had with all laws
6 and rules of Court relating to the taking of
7 depositions.

8 IT IS FURTHER STIPULATED AND AGREED
9 that it shall not be necessary for any
10 objections to be made by counsel to any
11 questions except as to form or leading
12 questions, and that counsel for the parties may
13 make objections and assign grounds at the time
14 of the trial, or at the time said deposition is
15 offered in evidence, or prior thereto.

16 IT IS FURTHER STIPULATED AND AGREED
17 that the notice of filing of the deposition by
18 the Commissioner is waived.

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I N D E X

EXAMINATION

PAGE LINE

By Ms. Perales..... 7 18

By Mr. Disher..... 165 14

DEFENDANT'S EXHIBITS

PAGE LINE

Defendant's Exhibit 1 - Notice of
Deposition..... 16 16

Defendant's Exhibit 2 - Felton resume 17 22

Defendant's Exhibit 3 - Declaration
signed by G. Felton,
August 7, 2019, with
previous declaration
attached..... 35 1

Defendant's Exhibit 4 - Portion of
Modified Adjusted Gross
Income manual - Bates 354
to 425..... 47 19

Defendant's Exhibit 5 -
Spreadsheets for
individuals with DACA

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designation..... 93 22

Defendant's Exhibit 6 - Subpoena

duces tecum..... 145 9

* * * * *

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

CASE NUMBER: 1:18-CV-68

STATE OF TEXAS, et al.,

Plaintiffs,

vs.

UNITED STATES OF AMERICA, et al.,

Defendants,

and

KARLA PEREZ, et al.,

Defendant-Intervenors,

and

STATE OF NEW JERSEY,

Defendant-Intervenor.

BEFORE:

Angela Smith McGalliard,

Commissioner.

APPEARANCES:

TODD L. DISHER, ESQUIRE, of OFFICE OF
THE ATTORNEY GENERAL OF TEXAS, P.O. Box 12548,
Austin, Texas 78711, appearing on behalf of the
Plaintiffs.

1 JAMES WALKER, ESQUIRE, of U.S.
2 DEPARTMENT OF JUSTICE, P.O. Box 868,
3 Washington, D.C. 20044, appearing on behalf of
4 the Defendants.

5 WINFIELD J. SINCLAIR, ESQUIRE, of
6 OFFICE OF THE ATTORNEY GENERAL OF ALABAMA, 501
7 Washington Ave., Montgomery, Alabama 36104,
8 appearing on behalf of the Deponent.

9 JEREMY HOLLANDER, ESQUIRE, of OFFICE
10 OF THE ATTORNEY GENERAL OF NEW JERSEY, 25
11 Market Street, 8th Floor, Trenton, New Jersey
12 08625, appearing by telephone on behalf of the
13 Defendant-Intervenor.

14 NINA PERALES, ESQUIRE, of MALDEF, 110
15 Broadway, Suite 300, San Antonio, Texas 78205,
16 appearing on behalf of the
17 Defendant-Intervenors.

18 RAMON A. SOTO, ESQUIRE, of MALDEF,
19 110 Broadway, Suite 300, San Antonio, Texas
20 78205, appearing on behalf of the
21 Defendant-Intervenors.

22 ALSO PRESENT: Bo Offord, Esq.

23 * * * * *

1 I, Angela Smith McGalliard,
2 Registered Professional Reporter, Certified
3 Realtime Reporter and Certified Shorthand
4 Reporter, of Pike Road, Alabama, acting as
5 Commissioner, certify that on this date, as
6 provided by the Federal Rules of Civil
7 Procedure and the foregoing stipulation of
8 counsel, there came before me at the offices of
9 the Alabama Attorney General, 501 Washington
10 Ave., Montgomery, Alabama 36104, beginning at
11 9:22 a.m., Gretel Felton, witness in the above
12 cause, for oral examination, whereupon the
13 following proceedings were had:

14 GRETEL FELTON,
15 being first duly sworn, was examined and
16 testified as follows:

17 EXAMINATION

18 BY MS. PERALES:

19 Q. Good morning.

20 A. Good morning.

21 Q. My name is Nina Perales, and I am
22 one of the attorneys in this litigation. I
23 represent the group of people in the case known

1 Q. Of course.

2 A. Of course, that's just the MAGI
3 that we're talking about that are in the new
4 system.

5 Q. Okay. Were there any documents
6 that were requested in the subpoena duces tecum
7 that exist but that you weren't able to bring
8 today?

9 MR. SINCLAIR: Object to the
10 form.

11 MR. DISHER: And I'll just add to
12 that one, just so there's clarity, I do -- I
13 understand, perhaps, that there are some
14 additional documents that are going through the
15 security review process. Those are not the
16 documents that were in Ms. Felton's possession,
17 custody, or control, and those are not
18 documents that she relied on to form the
19 opinions expressed in her declaration. But
20 there may very well be additional documents
21 that are still going through the security
22 review process.

23 MS. PERALES: Okay. Thank you.


REPORTER'S CERTIFICATE

STATE OF ALABAMA,
MONTGOMERY COUNTY,

I, Angela Smith McGalliard, Registered Professional Reporter, Certified Realtime Reporter, Certified Court Reporter and Commissioner for the State of Alabama at Large, do hereby certify that the above and foregoing proceeding was taken down by me by stenographic means, and that the transcript was produced by computer aid under my supervision, and that the foregoing represents a true and correct transcript of the proceedings occurring on said date and at said time.

I further certify that I am neither of kin nor of counsel to the parties to the action; nor in any manner interested in the result of said case.

Signed the 26th day of September, 2019.



Angela Smith McGalliard

ANGELA SMITH MCGALLIARD, RPR, CRR, CCR

AL CCR Lic. No. 98, Expires 9/30/20

Notary Expiration 8/13/2023

EXHIBIT B

Transcript of the Testimony of
Franklin, Mary Elizabeth

Date: September 18, 2019

Case: State of Texas, et al. v. United States of America, et al.

Bushman Court Reporting

Connie Williams

Phone: (501) 372-5115

Fax: (501) 378-0077

[<www.bushmanreporting.com>](http://www.bushmanreporting.com)

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

STATE OF TEXAS, et al., PLAINTIFFS

v. CASE NO. 1:18-CV-68

UNITED STATES OF AMERICA, et al., DEFENDANTS

and

KARLA PEREZ, et al., DEFENDANT-INTERVENORS

and

STATE OF NEW JERSEY DEFENDANT-INTERVENOR

DEPOSITION OF:

MARY ELIZABETH FRANKLIN

(Taken September 18th, 2019,
at 9:01 a.m.)

APPEARANCES

ON BEHALF OF THE PLAINTIFFS, ET AL.:

TODD L. DISHER, ESQUIRE
Trial Counsel for Civil Litigation
P.O. Box 12548
Austin, Texas 78711-2548
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ON BEHALF OF THE UNITED STATES OF AMERICA,
et al.:

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RAMON A. SOTO, ESQUIRE
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E-mail: nperales@maldef.org
rsoto@maldef.org

ON BEHALF OF THE STATE OF NEW JERSEY:

JEREMY E. HOLLANDER, ESQUIRE (via telephone)
Assistant Attorney General
Office of the Attorney General of New Jersey
25 Market Street, 8th Floor
Trenton, New Jersey 08625
E-mail: jeremy.hollander@law.njoag.gov

ALSO PRESENT:

ATTORNEY GENERAL LESLIE RUTLEDGE
DYLAN L. JACOBS, Assistant Solicitor General
323 Center Street, Suite 200
Little Rock, Arkansas 72201
Email: Dylan.Jacobs@arkansasag.gov

1 Is that right?

2 A Yes.

3 Q And was there an attachment to that e-mail where
4 Ms. Ashley sends you an attachment?

5 A Yes, that was this [indicating].

6 Q Exhibit 4?

7 A Yes.

8 Q Okay. And then it looks like I see an e-mail above
9 that where you're sending a communication. You're
10 sending an e-mail to Mr. Jacobs; is that right?

11 A Yes.

12 Q That's dated September 3rd?

13 A Yes.

14 Q And was there an attachment to this e-mail?

15 A No. At this point he just got the chain.

16 Q I understand.

17 A He just got the chain, not all the attachments
18 within the chain.

19 MS. PERALES: Okay. So at this point I'd
20 like to request of counsel that we receive the
21 attachments that were associated with these
22 e-mails.

23 MR. DISHER: We will certainly discuss
24 that and look at the attachments and then
25 communicate that back to you whether we can

1 produce that. But we'll take a look at it for
2 sure.

3 MS. PERALES: Thank you.

4 MR. DISHER: And presumably there will be
5 redactions that have to be done.

6 MS. PERALES: Understood.

7 BY MS. PERALES:

8 Q We have two more e-mail strings associated with
9 this exhibit, and it looks like there might be a little
10 bit of an overlap in some of the e-mails.

11 So if we turn to Bates 441, which is the
12 beginning of that second string, we see an e-mail from
13 Ms. Ashley to you on July 26. That looks like the same
14 e-mail that we see on Bates 439. But I just wanted you
15 to confirm that for me.

16 A Yes.

17 Q Then behind that, on Bates page 442, it looks like
18 the same e-mail that we see on Bates 439; is that right?

19 A Yes.

20 Q So we've already talked about those.

21 And then, of course, I see across the top that
22 you're sending these e-mails to Mr. Jacobs with an FYI,
23 right?

24 A Yes.

25 Q Then, finally, let's turn to Bates 443, which is

1 Exhibit 4 without the claims column.

2 Q Sure.

3 A It's not here.

4 Q And I also don't have the unredacted version --

5 A That's correct.

6 Q -- which I presume at some point passes through
7 you?

8 A Yes.

9 Q Did you receive any other documents that were
10 either explanatory to what you were receiving, or were
11 like backup runs, or anything like that?

12 A No.

13 Q Did you bring any documents explaining for
14 Exhibit 4 how much of the amounts represented in the
15 final column total paid amount were reimbursed at 100
16 percent by CHIP?

17 A No.

18 Q Did you bring any documents showing how the DACA
19 designation is communicated to your eligibility system
20 by the VLP?

21 A No.

22 MS. PERALES: You mentioned earlier that
23 there was a key of status codes, I guess, for
24 lack of a better word. I believe that that
25 key would be responsive to the subpoena duces

1 tecum. And so I'd like to ask for the
2 production of the key.

3 MR. DISHER: We will look at the key and
4 evaluate to the extent that we have it. I've
5 never seen it. And so we'll see if we can
6 find it and we'll take a look at it and we'll
7 communicate with you about it.

8 MS. PERALES: Okay. Thank you.

9 I'd also like to request if there's any
10 document, other than the key document, that
11 shows us how DACA-related information is
12 communicated out of the hub or out of the VLP
13 to the state eligibility system.

14 MR. DISHER: I understand.

15 MS. PERALES: We need a minute.

16 MR. DISHER: Sure.

17 (A recess was taken from 12:18 p.m. to
18 12:24 p.m.)

19 MS. PERALES: I pass the witness.

20 MR. DISHER: Jeremy, do you have any
21 questions?

22 MR. HOLLANDER: No, not at this time.

23 EXAMINATION

24 BY MR. DISHER:

25 Q First I want to talk about the CHIP reimbursement

C E R T I F I C A T E

STATE OF ARKANSAS)
COUNTY OF PERRY)

I, Connie M. Williams, Certified Court Reporter and Notary Public, do hereby certify that the facts stated by me in the caption on the foregoing proceedings are true; and that the foregoing proceedings were reported verbatim through the use of the stenographic method and thereafter transcribed by me or under my direct supervision to the best of my ability, taken at the time and place set out on the caption hereto.

I further certify that in accordance with Rule 30(e) of the Rules of Civil Procedure, review of the transcript was requested by the deponent or a party thereto.

I further certify that I am not a relative or employee of any attorney or employed by the parties hereto, nor financially interested in the outcome of this action, and that I have no contract with the parties, attorneys, or persons with an interest in the action that affects or has a substantial tendency to affect impartiality, that requires me to relinquish control of an original deposition transcript or copies of the transcript before it is certified and delivered to the custodial attorney, or that requires me to provide any service not made available to all parties to the action.

WITNESS MY HAND AND SEAL this 1st day of
October, 2019.

Connie M. Williams



CONNIE M. WILLIAMS
CCR, LS No. 750, Notary Public in
and for Perry County, Arkansas
My Commission Expires 5/2/23

SIGNATURE OF DEPONENT CERTIFICATE

I, MARY ELIZABETH FRANKLIN, do hereby certify that I have read the foregoing deposition, taken on September 18th, 2019, and that, to the best of my knowledge and belief, said deposition is true and accurate with the exception of the following corrections listed below:

[illegible]

Date: _____
 Witness Signature: _____
 STATE OF _____
 COUNTY OF _____

SUBSCRIBED AND SWORN TO before me this
____ day of _____, 2019.

My Commission expires:

Notary Public: _____

EXHIBIT C

Nina Perales

From: Nina Perales
Sent: Friday, October 04, 2019 7:00 PM
To: 'Disher, Todd'
Cc: Glenn Moramarco; Robins, Jeffrey (CIV); Biggs, Adam; Ramon Soto
Subject: RE: DACA - Discovery

Todd,

Thanks very much for the confirmation.

We have carefully reviewed the documents that Plaintiffs produced this week in response to the subpoenas, as well as the documents provided to us at the depositions.

Although the produced documents describe processes related to Medicaid eligibility determinations by Alabama and Arkansas, they do not mention DACA.

Specifically, the documents do not respond to the requests for “[d]ocuments showing the types of data maintained by the [Alabama Medicaid Agency and Arkansas Department of Human Services] evidencing immigration and citizenship status of Medicaid applicants or beneficiaries.” The documents also do not show “the types of data maintained by the [two state agencies] evidencing receipt of DACA by Medicaid applicants or beneficiaries.” The documents also do not show when and how Alabama and Arkansas capture and store information showing that Medicaid applicants are recipients of DACA.

Although we understand your position that you have provided responsive documents and your request that we withdraw the motion to compel, we respectfully decline to do so because we do not believe the documents are responsive to the subpoenas duces tecum.

I will be in the office all day Monday and can discuss the matter further at your convenience. Thank you have and have a good weekend,

Nina Perales
Vice President of Litigation
Mexican American Legal Defense
and Educational Fund, Inc. (MALDEF)
110 Broadway, Suite 300
San Antonio, TX 78205
Ph (210) 224-5476 ext. 206
FAX (210) 224-5382



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telephone at 210-224-5476 and/or by reply to this communication and delete this message. Persons responsible for delivering this communication to the intended recipient are admonished that this communication not be copied or disseminated except as directed by the intended recipient.

From: Disher, Todd [mailto:Todd.Disher@oag.texas.gov]
Sent: Friday, October 04, 2019 12:29 PM
To: Nina Perales
Cc: Glenn Moramarco; Robins, Jeffrey (CIV); Biggs, Adam; Ramon Soto
Subject: Re: DACA - Discovery

Confirmed. Those are the correct ranges.

Todd Lawrence Disher

Trial Counsel for Civil Litigation
Office of the Attorney General of Texas
P.O. Box 12548 (MC 001)
[Austin, TX 78711-2548](#)
[\(512\) 936-2266](#)
Todd.Disher@oag.texas.gov

On Oct 4, 2019, at 11:00 AM, Nina Perales <nperales@maldef.org> wrote:

Todd,

Thank you for the email and the additional production. We were able to open the link on Tuesday morning and I'd like to verify with you that we accessed all the documents that you produced:

1. "AR Docs 2. pdf" containing Bates 764-1134
2. "AL Docs 2.pdf" containing Bates 713-763
3. "TX v. US DACA Joint Stip.docx"

Please let me know if these are all the documents you produced (with the full page ranges) and that there are no other documents in the encrypted message that may have needed special software to detect.

Many thanks,

Nina Perales
Vice President of Litigation
Mexican American Legal Defense
and Educational Fund, Inc. (MALDEF)
110 Broadway, Suite 300
San Antonio, TX 78205
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FAX (210) 224-5382

<image001.png>

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From: Disher, Todd [<mailto:Todd.Disher@oag.texas.gov>]
Sent: Tuesday, October 01, 2019 5:32 PM
To: Nina Perales; Glenn Moramarco; Robins, Jeffrey (CIV)
Cc: Biggs, Adam
Subject: DACA - Discovery

I just sent all of you documents from Alabama and Arkansas. Please let me know if you do not receive the documents or have trouble accessing the files.

Todd Lawrence Disher

Trial Counsel for Civil Litigation
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